

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
AT LAW AND IN ADMIRALTY

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$94,600.00 IN  
UNITED STATES CURRENCY,

ONE 2005 BENTLEY CONTINENTAL GT  
COUPE, VEHICLE IDENTIFICATION NUMBER  
(VIN) SCBCR63W65CO29162, WITH ALL  
APPURTENANCES AND ATTACHMENTS  
THEREON,

ONE CUSTOM HAND-MADE 3-D DIAMOND  
SHIELD PENDANT BEARING THE INITIALS  
“HK,”

ONE LADIES’ BREITLING CUSTOM BLACK  
MOTHER-OF-PEARL DIAMOND WATCH, and

ONE MEN’S 10-KARAT YELLOW GOLD  
DIAMOND BRACELET,

Defendants.

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**VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM**

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The United States of America, by its attorneys, James L. Santelle, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for said district, alleges as follows:

1. This is a civil action *in rem* brought to enforce the provisions of Title 18, United States Code, Sections 981(a)(1)(A) and (C), which provide for the forfeiture of properties that

were involved in a transaction or attempted transaction in violation of Title 18, United States Code, Sections 1956 and 1957 and that constitute or were derived from proceeds traceable to an offense constituting a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7) and 1961(1).

2. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

3. This Court has *in rem* jurisdiction over the defendant properties under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

4. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1) and (2) and 1395(b) because acts or omissions giving rise to the forfeiture occurred in this district and because the defendant properties were found in this district.

5. The defendant properties are described below, and are presently in the custody of the Internal Revenue Service:

- A. Approximately \$94,600 in United States currency seized by the Milwaukee Police Department from the residence of Tyrone McMillian located at 6XXX W. Darnell, Brown Deer, Wisconsin, on or about July 6, 2011, and, on or about October 28, 2013, seized by the Internal Revenue Service pursuant to seizure warrant number 13-M-581 issued by the Honorable William E. Callahan, Jr., United States Magistrate Judge for the Eastern District of Wisconsin;
- B. One 2005 Bentley Continental GT Coupe bearing vehicle identification number SCBCR63W65CO29162 seized by the Milwaukee Police Department from the residence of Tyrone McMillian located at 6XXX W. Darnell, Brown Deer, Wisconsin, on or about July 6, 2011, and, on or about October 28, 2013, seized by the Internal Revenue Service pursuant to seizure warrant number 13-M-582 issued by the Honorable William E.

Callahan, Jr., United States Magistrate Judge for the Eastern District of Wisconsin;

- C. One custom hand-made 3-D diamond shield pendant bearing the initials “HK” seized by the Milwaukee Police Department from the residence of Tyrone McMillian located at 6XXX W. Darnell, Brown Deer, Wisconsin, on or about July 6, 2011, and, on or about October 28, 2013, seized by the Internal Revenue Service pursuant to seizure warrant number 13-M-583 issued by the Honorable William E. Callahan, Jr., United States Magistrate Judge for the Eastern District of Wisconsin;
- D. One ladies’ Breitling custom black mother-of-pearl diamond watch seized by the Milwaukee Police Department from the residence of Tyrone McMillian located at 6XXX W. Darnell, Brown Deer, Wisconsin, on or about July 6, 2011, and, on or about October 28, 2013, seized by the Internal Revenue Service pursuant to seizure warrant number 13-M-584 issued by the Honorable William E. Callahan, Jr., United States Magistrate Judge for the Eastern District of Wisconsin; and
- E. One men’s 10-karat yellow gold diamond bracelet seized by the Milwaukee Police Department from the residence of Tyrone McMillian located at 6XXX W. Darnell, Brown Deer, Wisconsin, on or about July 6, 2011, and, on or about October 28, 2013, seized by the Internal Revenue Service pursuant to seizure warrant number 13-M-585 issued by the Honorable William E. Callahan, Jr., United States Magistrate Judge for the Eastern District of Wisconsin.

6. The facts and circumstances supporting the seizure and forfeiture of the defendant properties are contained in the affidavit of Matthew J. Rech III, which is attached hereto as Exhibit A and is fully incorporated herein by reference.

7. On or about January 13, 2014, Tyrone McMillian filed a claim to all five of the defendant properties.

8. On or about January 13, 2014, Ashley Knueppel filed claims to the following defendant properties: One 2005 Bentley Continental GT Coupe and one ladies’ Breitling custom black mother-of-pearl diamond watch.

9. On or about January 21, 2014, Milwaukee County Child Support Services, by and through its attorney, Brian C. Hartley, filed a claim to the following defendant property:

Approximately \$94,600 in United States currency.

10. The following defendant properties were derived from proceeds traceable to an offense constituting a specified unlawful activity, namely, the interstate transportation of stolen property, in violation of 18 U.S.C. § 2314, which offense is a specified unlawful activity under 18 U.S.C. §§ 1956(c)(7) and 1961(1), and are therefore subject to forfeiture to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(C):

- A. Approximately \$94,600 in United States currency;
- B. One 2005 Bentley Continental GT Coupe bearing vehicle identification number SCBCR63W65CO29162;
- C. One custom hand-made 3-D diamond shield pendant bearing the initials “HK”;
- D. One ladies’ Breitling custom black mother-of-pearl diamond watch; and
- E. One men’s 10-karat yellow gold diamond bracelet.

11. The following defendant property was derived in part from proceeds traceable to an offense constituting a specified unlawful activity, namely, sex trafficking by force, fraud, or coercion, in violation of 18 U.S.C. § 1591, which offense is a specified unlawful activity under 18 U.S.C. §§ 1956(c)(7) and 1961(1), and is therefore subject to forfeiture to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(C): One custom hand-made 3-D diamond shield pendant bearing the initials “HK.”

12. The following defendant properties were involved in money laundering transactions or attempted transactions in violation of 18 U.S.C. §§ 1956 and 1957, and are

therefore subject to forfeiture to the United States of America pursuant to 18 U.S.C.

§ 981(a)(1)(A):

- A. One custom hand-made 3-D diamond shield pendant bearing the initials “HK”;
- B. One ladies’ Breitling custom black mother-of-pearl diamond watch; and
- C. One men’s 10-karat yellow gold diamond bracelet.

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant properties identified above in paragraph 5.A. through 5.E. be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant properties to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 7<sup>th</sup> day of April, 2014.

Respectfully submitted,

JAMES L. SANTELLE  
United States Attorney

By:

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